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March 10, 2005

BY HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

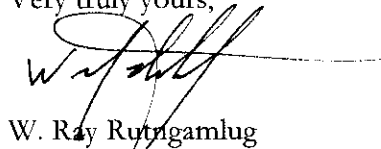
Re: In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM
Broadcast Stations. (Richlands, Shallotte, Topsail Beach, and Wrightsville Beach,
North Carolina); MB Docket No. 05-16

Dear Madame Secretary:

Enclosed for filing on behalf of Sea-Comm, Inc. ("Sea-Comm"), the licensee of primary commercial FM radio broadcasting stations WBNU, Shallotte, North Carolina ("WBNU"), WBNE, Wrightsville Beach, North Carolina ("WBNE"), and WWTB, Topsail Beach, North Carolina ("WWTB;" WWTB, with WBNU and WBNE, collectively, the "Sea-Comm Stations"), are the comments of Sea-Comm in response to the *Notice of Proposed Rule Making* released on January 28, 2005 in the above-captioned proceeding.

If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Very truly yours,



W. Ray Rutngamlug
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

Enclosure

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MB Docket No. 05-16
Table of Allotments,)	RM-11143
FM Broadcast Stations.)	
(Richlands, Shallotte, Topsail Beach, and)	
Wrightsville Beach, North Carolina))	

To: Assistant Chief, Audio Division, Media Bureau

COMMENTS OF SEA-COMM, INC.

Sea-Comm, Inc. ("Petitioner" or "Sea-Comm"), the licensee of primary commercial FM radio broadcasting stations WBNU, Shallotte, North Carolina ("WBNU"), WBNE, Wrightsville Beach, North Carolina ("WBNE"), and WWTB, Topsail Beach, North Carolina ("WWTB;" WWTB, with WBNU and WBNE, collectively, the "Sea-Comm Stations"), hereby submits its comments in response to the *Notice of Proposed Rule Making* in the above-captioned proceeding, DA 05-76, adopted January 26, 2005 and released January 28, 2005, 19 FCC Rcd. ____, 70 Fed. Reg. 7220-7221 (published on February 11, 2005) (the "*NPRM*"). The *NPRM* was issued at the behest of Sea-Comm, in response to Sea-Comm's Petition for Rule Making (the "Petition"), filed on April 12, 2004.

Sea-Comm welcomes the *NPRM*, and hereby incorporates by reference the information set forth in Petition.¹ Sea-Comm hereby reiterates its commitment promptly to apply to the

¹ The only issue that appeared to concern the Commission in the *NPRM* was the question of the so-called "*Tuck*" showing with respect to the independence of the community of Richlands, North Carolina from the Jacksonville, North Carolina Urbanized Area. *NPRM*, at Para. 2. However, inasmuch as the Commission proceeded in the next paragraph of the *NPRM* to state that "[t]his proposal . . . warrants consideration because it

(continued...)

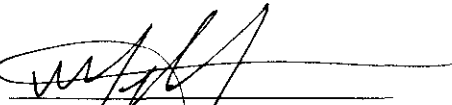
Commission for construction permits to implement the proposed changes to the Table of Allotments for FM Broadcast Stations, 47 C.F.R. Section 73.202(b) (2004), that are set out in the *NPRM*, and, if such authorizations are granted, promptly to implement such changes.

Sea-Comm respectfully urges the Commission to adopt a *Report and Order* in this proceeding at the earliest practicable date in a manner consistent with the *NPRM*.

Respectfully submitted,

SEA-COMM, INC.

By:



John Griffith Johnson, Jr.
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Its Attorneys

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March 10, 2005

(...continued)

could provide Richlands with its first local aural transmission service . . . ,” it is Sea-Comm’s understanding that the *NPRM* found Sea-Comm’s *Tuck* showing in that respect to be persuasive. In any event, by incorporating in these Comments Sea-Comm’s Petition, as is permitted in these kinds of proceedings, *NPRM* Appendix, at Para. 2, Sea-Comm believes that it has adequately addressed and resolved any *Tuck* issues pertaining to the matters raised in the *NPRM*.